

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LADIES PROFESSIONAL GOLF
ASSOCIATION,

Plaintiff,

against

JOONGANG ILBO CO., LTD.,

Defendant.

CIVIL ACTION NO.: 1:25-cv-02493-ALC

NOTICE OF MOTION TO DISMISS OR STAY

**TROUTMAN PEPPER
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*Attorneys for Defendant
JoongAng Ilbo Co., Ltd.*

PLEASE TAKE NOTICE that defendant JoongAng Ilbo Co., Ltd. (“Defendant” or “JoongAng”) hereby move for an order dismissing Plaintiff’s Complaint (ECF No. 1) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, or, in the alternative, to stay this action. The motion is supported by Memorandum of Law in Support of Defendants’ Motion to Dismiss or Stay and the Declaration of Jinhee Kim, both of which are being filed contemporaneously.

Dated: June 20, 2025
New York, New York

Respectfully submitted,

/s/ Joseph M. DeFazio

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Attorneys for Defendant JoongAng Ilbo Co., Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June 2025, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system.

/s/ Joseph M. DeFazio
Joseph M. DeFazio